



NATIONAL PARK SERVICE

Environmental Audit Program

EnviroCheck Sheet

*Green Procurement
June 2002 Update*

GREEN PROCUREMENT

Green procurement involves the purchase of products and services that are considered environmentally preferable because they exhibit characteristics or properties that have fewer negative impacts on human health and the environment, when compared to similar products. Green products may contain recycled materials or be more recyclable, be less toxic or more biodegradable, have less packaging or cost less to transport, be more durable or use less energy or natural resources over their useful life.

As the steward of the nation's most valued public lands, the National Park Service (NPS) has a special obligation to be a leader in environmental initiatives such as green procurement. Each year the NPS purchases a vast number of goods and services. This enormous purchasing power gives the NPS an opportunity to support green products and encourage manufacturers to provide more of these products.

Auditor's Guidelines:

Records to Review

- Purchase orders
- Credit card training documentation
- Pollution Prevention Program
- Standard green procurement contract language or contract-specific language

Features to Observe

- Plastic recycling bins
- Office paper
- Office supplies
- Lubricating oils
- Antifreeze
- Construction products
- Contract specifications

Persons to Contact

- Purchasing officer
- Auto mechanic/ maintenance personnel
- Office supply purchaser
- Contract officer
- Credit card holders

DEFINITIONS

Affirmative acquisition: The donating, buying, or purchasing preference of a product over a similar product because of certain characteristics or properties.

Environmentally preferable: Products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, or disposal of the product or service.

Green procurement/green procurement activities: The affirmative acquisition of environmentally preferable products.

Comprehensive Procurement Guideline (CPG) Program: Program authorizing EPA to designate products that are or can be made with recovered materials and to recommend practices for buying these products.

Affirmative Procurement Program (APP): Purchasing program outlined under Section 6002 of the Resource Conservation and Recovery Act (elements of which are discussed on page 6, below) and *required* of federal agencies under Executive Order 13101. Within one year after the EPA lists an item on the CPG, RCRA Section 6002 requires each procuring agency purchasing more than \$10,000 of a designated item, or functionally equivalent items in a fiscal year, to establish an APP for that item.

Biobased product: A commercial or industrial product (other than food or feed) that utilizes biological products or renewable domestic agricultural (plant, animal, and marine) or forestry materials.

Life cycle cost: The amortized annual cost of a product, including capital costs, installation costs, operating costs, maintenance costs, and disposal costs discounted over the lifetime of the product.

Life cycle assessment: The comprehensive examination of a product's environmental and economic aspects and potential impacts throughout its lifetime, including raw material extraction, transportation, manufacturing, use, and disposal.

Pollution prevention: "Source reduction," as defined in the Pollution Prevention Act of 1990, and other practices that reduce or eliminate the creation of pollutants through increased efficiency in the use of raw materials, energy, water, or other resources; or protection of natural resources by conservation.

Recovered material: Waste materials and byproducts that have been received or diverted from solid waste.

Recyclability: The ability of a product or material to be recovered from, or otherwise diverted from, the solid waste stream for the purpose of recycling.

Recycling: The act of producing new products or materials from previously used and collected materials.

Reuse: The act of reusing a previous item for another purpose.

Post-consumer material: A material or finished product that has served its intended use and has been diverted or received from waste destined for disposal.

Waste prevention: Any change in the design, manufacturing, purchase, or use of materials or products (including packaging) to reduce their amount or toxicity before they are discarded. Waste prevention also refers to the reuse of products or materials.

Waste reduction: Preventing or decreasing the amount of waste being generated through waste prevention, recycling, or purchasing recycled and environmentally preferable products.

REGULATORY REQUIREMENTS

Federal

The President and Congress have recognized the benefits of green procurement and have incorporated the affirmative procurement of environmentally preferred products into federal acquisition regulations (FAR). Following are presidential Executive Orders (EOs) and congressional mandates relative to green procurement.

Executive Order 13101 - Greening the Government Through Waste Prevention, Recycling and Federal Acquisition, issued on September 14, 1998, requires federal agencies to incorporate waste prevention and recycling into their daily operations and work to increase and expand markets for recovered materials through greater federal government preference and demand for such products. EO 13101 directs many of its goals toward federal agencies, as opposed to individual federal facilities. However, many of its elements can and are expected to be implemented at the facility level.

Sec. 401. of the EO requires specific acquisition planning. As such, in developing plans, drawings, work statements, specifications, or other product descriptions, agencies are required to consider, as appropriate, a broad range of factors including:

- Elimination of virgin material requirements;
- Use of bio-based products;
- Use of recovered materials;
- Reuse of product;
- Lifecycle cost and recyclability of products;
- Use of environmentally preferable products;
- Waste prevention (including toxicity reduction); and
- Ultimate disposal of products.

These factors should be considered in acquisition planning for all procurement and in the evaluation and award of contracts, as appropriate. Program and acquisition managers should take an active role in these activities.

Sec. 402 of the EO requires the development and implementation of affirmative procurement programs in accordance with section 6002 of RCRA (discussed below). Agencies shall establish affirmative procurement programs for all EPA-designated guideline items purchased by their agency.

Executive Order 13148 - Greening the Government Through Leadership in Environmental Management, issued on April 22, 2000, requires federal agencies to develop formal environmental management systems.

Sec. 204 of this EO requires a reduction in Toxic Release Inventory (TRI) releases and off-site transfers of toxic chemicals for treatment and disposal. This goal is expected to be achieved “through innovative pollution prevention, effective facility management, and sound acquisition and procurement practices.” Agencies are expected to reduce their TRI releases by 10 percent annually, 40 percent overall, by December 31, 2006.

Sec. 205 requires a reduction in the use of “Toxic Chemicals and Hazardous Substances and Other Pollutants.” Through identification of proven substitutes and established facility management practices, including pollution prevention, each agency is required to reduce its use of selected toxic chemicals, hazardous substances, and pollutants, or its generation of hazardous and radioactive waste types at its facilities by 50 percent by December 31, 2006.

Sec. 207 requires “Environmentally and Economically Beneficial Landscaping Practices.” Each agency is expected to strive to promote the sustainable management of federal facility lands through the implementation of cost-effective, environmentally sound landscaping practices, and programs to reduce adverse impacts to the natural environment. Guidance for implementing this element of the EO was published in the Federal Register on August 10, 1995. The Office of the Federal Environmental Executive has a link to that guidance on its website at <http://www.ofee.gov>, on the “Related Resources” page.

Executive Order 13149 - Greening the Government Through Federal Fleet and Transportation Efficiency

The purpose of this EO is to ensure that the federal government exercises leadership in the reduction of petroleum consumption through improvements in fleet fuel efficiency and the use of alternative fuel vehicles (AFVs) and alternative fuels. It is anticipated that the reduction in petroleum use and the displacement of petroleum by alternative fuels will help promote markets for more alternative fuel and fuel efficient vehicles, encourage new technologies, enhance the United States’ energy self-sufficiency and security, and ensure a healthier environment through the reduction of greenhouse gases and other pollutants in the atmosphere.

Section 6002 of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended, directs EPA to designate items that are or can be produced with recovered materials and to recommend practices for buying these items. Section 6002 provides criteria for EPA to consider when selecting items for designation, and requires procuring agencies to establish affirmative procurement programs for designated items. Section 6002 also requires each procuring federal agency to establish an affirmative procurement program for maximizing its purchases of EPA-designated items. The program should be developed in a manner that ensures that items composed of recovered materials are purchased to the maximum extent practicable consistent with federal procurement law. Affirmative procurement programs must have these elements: a preference program, promotion program, procedures for vendor estimation, certification, and verification, and an annual review and monitoring program.

Comprehensive Procurement Guideline for Products Containing Recovered Materials, 40 CFR 247. As required by RCRA Section 6002 and reinforced by EO 13101, EPA establishes procurement requirements for designated products. Currently, eight categories of products made from recycled or recovered content have been listed in the CPG. Agencies must ensure that 100 percent of their product purchases meet or exceed the CPGs unless written justification states that a product is not available within a reasonable timeframe, does not meet performance standards, or is an unreasonable price. EPA also recommends the percent of recycled and recovered content for certain products in the Recovered Materials Advisory Notice (RMAN). The most recent list of CPGs is available online at <<http://www.epa.gov/cpg/>> .

Other Greening the Government Executive Orders

Additional Executive Orders related to Greening the Government There are EOs establishing affirmative procurement policies for products including Energy Star computer equipment, energy and water efficient equipment, and products containing less toxic materials and ozone depleting substances. Copies of these EO are available for the Office of the Federal Environmental Executive at <<http://www.ofee.gov/>>.

The Federal Acquisition Regulation (FAR) 48 CFR Part 23

The FAR directs federal agencies to incorporate policies for the acquisition of environmentally preferable and energy efficient products and services to the maximum extent practical and to consider environmental objectives in every source selection. These parts are particularly applicable: Part 23.4 Use of Recovered Materials, Part 23.7 Contracting for Environmentally Preferable and Energy-Efficient Products and Services, and Part 23.8 Ozone-depleting Substances. The FAR (48 CFR Parts 2 and 4, et al., Federal Requirements Supporting Procurement of Recycling Products and Environmentally Preferable Services, Proposed Rule) is currently being revised to further address environmentally preferable purchasing requirements, including its application to micropurchases.

Department of Interior and National Park Service Policy

Following are policies or publications produced by the Department of Interior (DOI) or NPS regarding green procurement:

Greening the Interior: Strategic Plan for Greening the Department of Interior Through Waste Prevention, Recycling and Federal Acquisition, issued May 2000. The Strategic Plan outlines goals, implementing strategies, and management controls to satisfy the requirements of EO 13101 and to further focus DOI facilities towards more sustainable design and operations. The Strategic Plan specifies waste reduction and green procurement goals.

Department of the Interior (DOI) Acquisition Policy Release (DIAPR) 92-12, "Interim Acquisition Policy Release Establishing a Department-wide Affirmative Procurement Program;" "General Guidance on Pollution Prevention and Right-to-Know, Recycling and Green Acquisition;" DIAPR 97-2, "Guide to Environmental Contracting;" and Office of Federal Procurement Policy (OFPP) Policy Letter 92-4. These documents represent DOI policies

regarding the Department's Affirmative Procurement Program policy. These policies and support documents have been created as required under EO 13101, Section 402. The DOI policy stipulates that preference will be given in the procurement of products and services of similar price and performance to those having more environmentally preferable qualities. Products and services with environmental benefits may be purchased at higher cost over less environmentally sound products and services, particularly if use of the product will result in cost-savings elsewhere in the product's life-cycle.

COMPLIANCE REQUIREMENTS

EPA's Comprehensive Procurement Guidelines

To fulfill the regulatory requirements of 40 CFR 247, EPA has developed the Comprehensive Procurement Guidelines (CPG) program. A key component of the CPG program is EPA's list of designated products and the accompanying recycled content recommendations. EPA has created this list in order to assist the regulated community in complying with the procurement requirements under 40 CFR 247.

Items currently designated by EPA under the Comprehensive Procurement Guidelines include products in the following categories:

- Paper and paper products;
- Vehicular products (e.g., lubricating oil, tires, coolants);
- Construction products (e.g., shower and restroom dividers/partitions containing recovered plastic or steel);
- Transportation products (e.g., parking stops made from concrete or containing recovered plastic or rubber);
- Park and recreation products (e.g., park benches and picnic tables containing recovered steel, aluminum, plastic, or concrete);
- Landscaping products (e.g., plastic lumber landscaping timbers);
- Non-paper office products (e.g., plastic trash bags, printer ribbons); and
- Miscellaneous products listed at 40 CFR 247.17 (e.g., sorbents containing recovered materials for use in oil and solvent clean-ups).

EPA research indicates that the designated items are of high quality, are widely available, and cost-competitive with products made from virgin materials. Moreover, Government procurement of these products will create markets for a variety of recycled materials that make up a large part of the municipal waste stream, including various types of paper, used tires, oil and antifreeze, plastics, steel, and yard debris. Purchase of the guideline items also creates markets for non-hazardous industrial wastes that are generated in large quantities, such as coal fly ash and blast furnace slag.

Any park staff having the authority to make purchases using federal funds should be aware of the necessity to purchase products meeting the specifications indicated for products on the CPG list. In 1999, the Office of Federal Environmental Executive and EPA's Office of Solid Waste and Emergency Response prepared an inspections guidance titled *Guidance on Conducting Inspections of Federal Facilities for Compliance with Section 6002 of the Resource Conservation and Recovery Act*. As directed by EO 13101, EPA is required to use the guidance whenever they conduct RCRA compliance inspections. In addition to EPA's regulatory inspections, the guidance also may be used by states authorized to conduct inspections under RCRA.

After reviewing the pre-visit questionnaire and conducting an initial review of facility operations, the auditor should review the list of CPG designated products and review a sample of park purchases to determine the extent which the CPG requirements have been met.

EPA is required to update the list CPG products at least every two years. The next update is required by law to occur by 2003. The most up-to-date information is available on EPA's website at <<http://www.epa.gov/cpg/>>.

Following are additional regulatory requirements under the Comprehensive Procurement Guidelines.:

Contracting Officer Requirements

The CPG (at 40 CFR 247) stipulates that contracting officers must require vendors to:

1. Certify that the percentage of recovered materials to be used in the performance of the contract will be at least the amount required by applicable CPG specifications or other contractual requirements; and
2. Estimate the percentage of total material utilized for the performance of the contract which is recovered materials.

Affirmative Procurement Programs

RCRA section 6002(i) provides that each federal facility which purchases CPG-designated items must establish an affirmative procurement program for procuring those items, that contains the following elements:

- A preference for purchasing items designated under the Comprehensive Procurement Guidelines;
- Methods of promoting the park's green procurement program;
- Procedures for obtaining and verifying estimates of recycled content from vendors and contractors; and
- An annual review and monitoring of program effectiveness.

GREEN PROCUREMENT CHALLENGES

Defining an Environmentally Preferred Product

The following should be considered when selecting green products and services to make sure they are the most environmentally preferable:

- *Multiple Attributes* - Ensure one environmental product attribute is not offset by a more serious impact.
- *Life Cycle Perspective* - Ensure the environmental impacts of a product consider the entire life cycle of the item (i.e., manufacturing, transport and packaging, use, disposal).
- *Magnitude of Impact* - Consider the scale and reversibility of the product or service's environmental impact.
- *Local Conditions* - Ensure the product will function properly based on the park's location and the product's intended use.
- *Product Attribute Claims* - Ensure the product and service contractor claims are true.

Implementing a Green Procurement Strategy

Depending upon the size and complexity of the facility, each park should establish a strategy to ensure that green procurement initiatives are implemented and are sustainable. A successful strategy may include the following steps:

- *Create a Green Task Force* - Assemble a group to oversee the process and include staff involved in buying and using products (e.g., purchasing, maintenance, concessions operators, etc.).

- *Develop a Procurement Baseline* - Assess current practices and product purchases to determine a baseline from which to develop its program.
- *Develop a Mission Statement and Goals* - Establish a green procurement policy and set purchasing targets. Goals establishing a percentage change, rather than numerical targets, should be set. Schedules and responsible parties should be identified and attainable product standards set.
- *Identify Required Purchases* - Establish procedures to affirmatively procure mandated products including CPG items, Energy Star computer equipment, and energy and water efficient appliances. Documentation as to why a required purchase was not made should be kept on file.
- *Identify Preferences in Purchasing* - Product specifications, Request for Proposals (RFPs), and other purchasing tools and selection processes may be designed giving preference to green products and services. The parks must be willing to try new companies, wait a little longer to get the product, and search a little more for the right vendor. The parks should also review contractor and concessioner proposals and site work plans for incorporation of green procurement.
- *Make Cost Calculations* - Evaluate product life cycle costs. Green products may cost more up front but save money over the entire product life cycle. The parks should be willing to pay more for new technology. WASO has limited funds available to offset some of the cost differential for green procurement.
- *Follow-up on Green Product Purchases* - The Green Task Force should get feedback from users on how the green product works. If one product does not perform, parks should be willing to try another. The parks should share performance successes and lessons learned through the National Green Alert and Maintenance Service-wide bulletin boards, the NPS product performance database (under development) and through other means.
- *Assess Program Growth* - Track purchases against mission goals and purchase targets and increase target goals and types of products as their program progresses.
- *Ensure Program Awareness* - Green procurement requirements and goals of the park should be disseminated to all levels of the organization so that green procurement is considered not only in larger acquisitions but also in smaller purchases such as those by credit card. The parks should promote green procurement internally through fact sheets, posters, training, and staff meetings discussions. Employees should be kept informed through training and electronic messaging.
- *Educate Park Visitors and Other Stakeholders* - The parks should inform visitors and the community at large about successful green procurement results to promote public awareness. This can be accomplished through interpretive displays, brochures, home pages, bulletin boards, and during tours.

MISCELLANEOUS GREEN PROCUREMENT ISSUES

Before You Buy

Before a purchase is made, the park should first determine whether the item is really needed, how much is needed, and whether another more sustainable item could be reused. Prescriptive purchasing controls the quantity purchased to avoid unnecessary waste, such as limiting the quantity of paint and thinner according to the square footage needing paint. The park should be able to demonstrate that such consideration is made *before* a purchase is made.

Where to Get Green Products

Evaluating products and services to determine if they are green can be complicated. Life cycle cost analysis and multiple attribute data can be difficult to obtain and assess. A tremendous number of government agencies and non-profit groups have developed green products listings (in addition to those on the CPG).

Information on green products and programs can be obtained from sources identified in this EnviroCheck Sheet (see resources listed below). Keep in mind, technology for green products is rapidly changing and improving. Remind park staff that whereas a “green” product may have a poor track record in the past, it may now have excellent performance and environmental attributes.

Recordkeeping

The parks should track green purchases in order to demonstrate compliance with regulations (e.g. purchase of recycled content required products, Energy Star equipment) and to determine if green procurement goals set for the park are being met. NPS-wide roll-up reporting on green procurement is not currently required but may be mandated in the future.

NPS SUCCESS STORIES

- Wright Brothers National Monument purchased 12 picnic tables of recycled plastic/recycled lumber. The tables cost \$400 to \$442 each and require no maintenance. Regular lumber tables, by contrast, require painting or staining every 1-3 years.
- The Yosemite National Park vehicle maintenance shop won the 2000 DOI Environmental Achievement Award for switching to green products in its maintenance shop.
- Agate Fossil Beds National Monument used recycled plastic for a simulated wood fence around the exterior of the maintenance complex and similar recycled materials for the tables and benches at the park's new picnic area.
- Fort Vancouver National Historic Site has developed a green procurement tool kit available at <http://www.nps.gov/sustain/spop/eval.html>.
- Yellowstone National Park green cleaning products inventory and green product substitution, use of biobased lubricants, plastic lumber boardwalk.
- Intermountain Region chemical inventory and green product substitution.
- Northeast Region green resource guide.
- Curecanti National Recreation Area Eco-Shake recycled content roof shingles.
- PWR Green Building Materials for Maintenance Training, June 1999.

SOURCES OF INFORMATION ON GREEN PROCUREMENT	
Source	Contact Information (URL)
US Environmental Protection Agency's web site for the Comprehensive Procurement Guideline (CPG) federal requirements for purchasing products with recycled content, product lists and suppliers.	RCRA-hotline (800) 424-9346 http://www.epa.gov/cpg/
"Guidance on Conducting Inspections of Federal Facilities for Compliance with Section 6002 of the Resource Conservation and Recovery Act"	http://es.epa.gov/oeca/fedfac/policy/rcra2.pdf
US EPA's Environmentally Preferable Purchasing website.	http://www.epa.gov/opptintr/epp
Federal Affirmative Procurement Program, informational document regarding the requirements of the program.	http://www.epa.gov/cpg/pdf/app.pdf
Office of Federal Environmental Executive. The OFEE's mission is to advocate, coordinate, and assist environmental efforts of the federal community in waste prevention, recycling, the affirmative procurement of guideline items and the acquisition of recycled and environmentally preferable products and services. Their website contains a wealth of information regarding affirmative procurement.	http://www.ofee.gov
Tips for Buying "Green" with the Government Credit Card.	http://www.epa.gov/opptintr/epp/creditcard.htm
Environmentally Preferable Purchasing Guides covering the following: food service ware, copiers, cleaners, carpets, and electronics. Green purchasing information describing the challenges, successes, and resources associated with each product or service, focusing on how to incorporate environmental considerations into purchasing decisions.	http://www.epa.gov/opptintr/epp/pfs.htm
Government Services Administration (GSA), <i>Environmental Products Catalog</i> , GSA Advantage On-line Service, MUFFIN Electronic System, green purchasing guidance.	(800) 848-8923 http://pub.fss.gsa.gov/environ
Defense Supply Center (DSC). On-line catalog with environmentally preferable product designations.	(800) 345-6333 http://www.dscr.dla.mil/
Green Seal. Non-profit green product certification and research organization; listings of certified products; guidance on green procurement programs.	(202) 588-8400 Reports available at www.doi.gov/oepc , click on "green seal" www.greenseal.org
Federal Energy Management Program (FEMP). Energy Efficiency and Renewable Energy Clearinghouse; technologies and equipment, Center for Excellence for Sustainable Development.	(800) DOE-EREL http://www.eren.doe.gov/femp http://www.sustainable.doe.gov/index.html
Energy Star. Energy efficiency guidance for office equipment, lighting, and buildings product certification program.	http://www.epa.gov/appdstar/purchasing

This document does not necessarily contain all information needed to determine compliance status.

SOURCES OF INFORMATION ON GREEN PROCUREMENT	
Source	Contact Information (URL)
Fort Vancouver NHS green procurement tool kit.	http://www.nps.gov/sustain/spop/eval.html
LEED Green Building Rating System. U.S. Green Building Council, sustainable design and construction rating system.	(415) 445-9500 http://www.usgbc.org
Environmental Building News. Excellent technical newsletter on environmentally responsible design and construction. <u>Green Spec Binder</u> is a tool for green specs, containing manufacturer's literature by CSI divisions. www.greenspec.com .	(800) 861-0954 http://www.ebuild.com/
Greenline. Paper publication on analysis of environmentally friendly papers.	(415) 721-4230 http://www.conservatree.com/
Greening the Government: A Guide to Implementing EO 13101.	(202) 260-1297 http://www.ofee.gov/
King County Market. Information on sustainable building and recycled materials, linked sites.	http://dnr.metrokc.gov/market/map/index.htm
Alameda County, CA, Source Reduction and Recycling Board Resourceful Purchasing: A Hands-On Buyers Manual.	(510) 614-1699 http://www.stopwaste.org/
Institute for Local Self-Reliance Carbohydrate Economy Clearinghouse for plant-based products of all kinds, search function.	http://www.carbohydrateeconomy.org
USDA. Biobased agricultural products and vendor sourcebook. Biobased lubricating, oils, greases, cleaning products, and more.	http://www.usda.gov/aarc/srbk/index.htm
NPS Contacts	
National Green Alert Database. Electronic discussion database posting information on pollution prevention, green procurement, and environmental compliance. Park sharing of green news and product performance.	Lotus Notes Address Category within Park Operations Discussion Database
Hazardous Waste Management Team, Washington, DC. Guidance on policy and funding.	(202) 565-1245
Contract and Procurement Office, Washington, DC. Guidance on NPS service-wide green procurement requirements and initiatives.	(202) 565-1144



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As discussed above, the EPA's Office of Solid Waste and Emergency Response prepared an inspections guidance titled "Guidance on Conducting Inspections of Federal Facilities for Compliance with Section 6002 of the Resource Conservation and Recovery Act." EPA has directed its Regions to use the guidance during regulatory compliance inspections where RCRA compliance is a component of the inspection. In addition to EPA's regulatory inspections, the guidance also may be used by states authorized to conduct inspections under RCRA. Since individual federal facilities can be audited against the requirements addressed in this guidance and in EO 13101, the following checklist includes activities required of the "Agency" (i.e., DOI), that should be complied with, in spirit, at the facility level.

CHECKLIST ITEM	PRIORITY	NOTES
Greening the Government Requirements		
1. The park demonstrates that it purchases environmentally preferable products. [EO 13101]	2	
2. Training on the provisions of the Greening the Government Executive Orders is provided for program managers, contracting personnel, procurement and acquisition personnel, facility managers, contractors, concessioners, and other personnel as appropriate. [EO 13148, Sec. 404.(a)]	2	
3. Design and construction projects and policies incorporate sustainable design principles in addition to requirements to consider recovered materials and environmentally preferable products and practices. [BMP]	3	
Comprehensive Procurement Guidelines (CPG) Requirements <i>Questions 4-6 apply in situations where a park is purchasing items designated under the Comprehensive Procurement Guideline for Products Containing Recovered Materials (40 CFR 247). Requirements apply to any park staff member that may make purchases using federal funds(including contracting officers or park staff using a park-issued credit card). See page 5, above for a list of product categories designated under the CPG.</i>		
4. When purchasing products designated by EPA under the CPG, park staff making those purchases procure products composed of the highest percentage of recovered materials practicable. If park does not procure such items, the park documents that they are not reasonably available, fail to meet performance standards, or are not available at a competitive price. [40 CFR 247.2(d)]	2	
5. When purchasing products listed under the CPG, the park's contracting officer(s) requires vendors to: <ul style="list-style-type: none"> • Certify that materials to be used in the performance of the contract will meet CPG specifications; and • Estimate the <i>percentage of recovered materials</i> used to complete contract requirements. [40 CFR 247.4]	2	
6. If an "Affirmative Procurement Program" is required at the park (see definition on page 1, above), the APP has been established and includes: <ul style="list-style-type: none"> • A preference for purchasing items designated under EPA's CPG; • Methods of promoting the park's green procurement activities; • Procedures for obtaining and verifying estimates of recycled content from vendors and contractors; and • An annual review and monitoring of program effectiveness; [40 CFR 247.6]	2	

CHECKLIST ITEM	PRIORITY	NOTES
Toxics Reduction <i>Questions 7-10 apply to parks toxic chemicals (chemicals reported on the Toxic Release Inventory) or hazardous substances.</i>		
7. A plan has been developed to reduce Toxic Release Inventory (TRI) releases and the off-site transfer of toxic chemicals for treatment and disposal by 10 percent annually (40 percent overall) by December 31, 2006. [EO 13148, Sec. 204]	2	
8. The park is on track to achieve a 50 percent reduction in the use of toxic chemicals, hazardous substances, and pollutants by December 31, 2006. This may be demonstrated by such activities as the identification and use of proven substitutes and pollution prevention efforts. [BMP related to EO 13148, Sec. 205 which requires achievement of 50 percent goal by 2006.]	3	
9. When comparing products for purchase, park staff making purchases make an effort to purchase products with fewer hazardous substances. [BMP]	3	
10. The park has developed and implemented a pollution prevention program that considers the life cycle costs of treatment and/or disposal of waste or pollutants generated by a product, compared to the life cycle costs of alternatives that eliminate or reduce such pollutants. [EO 13148, Sec. 304]	2	
Pollution Prevention		
11. Programs exist at the park demonstrating environmentally and economically beneficial landscaping practices. [EO 13148, Sec 207]	2	
12. There is a program in place to reduce the park's vehicle fleet's annual petroleum consumption by at least 20 percent by the end of FY 2005, compared with FY 1999 petroleum consumption levels. [EO 13149, Sec 201]	2	